

FILED

JAN 22 2025

U.S. DISTRICT COURT- WVND
MARTINSBURG, WV 25401

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

MATTHEW BLAKE ROBINSON,
KAWANTE DAQUON MAXWELL, and
MARCUS DE'ANGELO BROWN,

Defendants.

Criminal No. 3:25-CR- 7

Violations:

18 U.S.C. § 922(a)(6)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 932(b)(1)
18 U.S.C. § 933(a)(1)
18 U.S.C. § 933(a)(2)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(False Statement During Purchase of a Firearm)

On or about August 3, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MATTHEW BLAKE ROBINSON**, in connection with the acquisition of a firearm, that is a Glock, Model 27, .40 caliber pistol bearing serial number UYG248, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented himself to be the actual purchaser when he was not; in violation of Title 18, United States Code, Section 922(a)(6) and 924(a)(2).

COUNT TWO

(Straw Purchasing of Firearm)

On or about August 3, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MATTHEW BLAKE ROBINSON** did knowingly purchase a firearm, to wit: a Glock, Model 27, .40 caliber pistol bearing serial number UYG248, in and otherwise affecting interstate and foreign commerce for, on behalf of, and at the request of demand of **KAWANTE DAQUON MAXWELL**, knowing and having reasonable cause to believe that **KAWANTE DAQUON MAXWELL** had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 932(b)(1).

COUNT THREE

(Trafficking in Firearms)

On or about August 3, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MATTHEW BLAKE ROBINSON** did ship, transport, transfer, cause to be transported, and otherwise dispose of a firearm, to wit: a Glock, Model 27, .40 caliber pistol bearing serial number UYG248, to **KAWANTE DAQUON MAXWELL** in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of the firearm by **KAWANTE DAQUON MAXWELL** would constitute a felony, and did attempt and conspire to do so, in violation of Title 18, United States Code, Section 933(a)(1).

COUNT FOUR

(Trafficking in Firearms)

On or about August 3, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **KAWANTE DAQUON MAXWELL** did receive from another person, in and otherwise affecting interstate and foreign commerce, a firearm, to wit: a Glock, Model 27, .40 caliber pistol bearing serial number UYG248, knowing and having reasonable cause to believe that such receipt would constitute a felony, and did attempt and conspire to do so, in violation of Title 18, United States Code, Section 933(a)(2).

COUNT FIVE

(Unlawful Possession of Firearm)

On or about August 3, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **KAWANTE DAQUON MAXWELL**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the felony offense of Burglary-Fourth Degree, in violation of CR.6.205(a), in the Circuit Court for Baltimore City, State of Maryland, in case number 320336002, did knowingly possess a Glock, Model 27, .40 caliber pistol bearing serial number UYG248, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT SIX

(False Statement During Purchase of a Firearm)

On or about August 16, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MATTHEW BLAKE ROBINSON**, in connection with the acquisition of a firearm, that is a Smith & Wesson, Model M&P 57, 5.7 caliber pistol bearing serial number EFC4008, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented himself to be the actual purchaser when he was not; in violation of Title 18, United States Code, Section 922(a)(6) and 924(a)(2).

COUNT SEVEN

(Straw Purchasing of Firearm)

On or about August 16, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MATTHEW BLAKE ROBINSON**, did knowingly purchase a firearm, to wit: a Smith & Wesson, Model M&P 57, 5.7 caliber pistol bearing serial number EFC4008, in and otherwise affecting interstate and foreign commerce for, on behalf of, and at the request of demand of **MARCUS DE'ANGELO BROWN**, knowing and having reasonable cause to believe that **MARCUS DE'ANGELO BROWN** had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 932(b)(1).

COUNT EIGHT

(Trafficking in Firearms)

On or about August 16, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MATTHEW BLAKE ROBINSON** did ship, transport, transfer, cause to be transported, and otherwise dispose of a firearm, to wit: a Smith & Wesson, Model M&P 57, 5.7 caliber pistol bearing serial number EFC4008, **MARCUS DE'ANGELO BROWN** in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of the firearm by **MARCUS DE'ANGELO BROWN** would constitute a felony, and did attempt and conspire to do so, in violation of Title 18, United States Code, Section 933(a)(1).

COUNT NINE

(Trafficking in Firearms)

On or about August 16, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MARCUS DE'ANGELO BROWN** did receive from another person, in and otherwise affecting interstate and foreign commerce, a firearm, to wit: a Smith & Wesson, Model M&P 57, 5.7 caliber pistol bearing serial number EFC4008, knowing and having reasonable cause to believe that such receipt would constitute a felony, and did attempt and conspire to do so, in violation of Title 18, United States Code, Section 933(a)(2).

COUNT TEN

(Unlawful Possession of Firearm)

On or about August 16, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MARCUS DE'ANGELO BROWN** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the felony offenses of "Sale for Profit a Controlled Drug (F)" in violation of Virginia Code Section 18.2-248 on February 24, 2023 in case number FE-2021-672 in the Circuit Court of Fairfax County, Virginia; Carry Pistol Outside Home/Business (Pistol), Unlawful Possession of a Firearm, Possession of Unregistered Firearm/Unlawful Possession of a Firearm or Destructive Device, Unlawful Possession Ammunition in case number 2012 CF2 -16435 in the Superior Court of the District of Columbia; and possession with intent to distribute cocaine in violation of 33-541(a)-(b) in the Superior Court of the District of Columbia in case number 07 CF2 8763; did knowingly possess a Smith & Wesson, Model M&P 57, 5.7 caliber pistol bearing serial number EFC4008, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT ELEVEN

(False Statement During Purchase of a Firearm)

On or about August 27, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MATTHEW BLAKE ROBINSON**, in connection with the acquisition of a firearm, that is a Glock, Model 43x, 9mm pistol, bearing serial number AKPS320, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented himself to be the actual purchaser when he was not; in violation of Title 18, United States Code, Section 922(a)(6) and 924(a)(2)

COUNT TWELVE

(Straw Purchasing of Firearm)

On or about August 27, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MATTHEW BLAKE ROBINSON** did knowingly purchase a firearm, to wit: a Glock, Model 43x, 9mm pistol, bearing serial number AKPS320, in and otherwise affecting interstate and foreign commerce for, on behalf of, and at the request of demand of **KAWANTE DAQUON MAXWELL**, knowing and having reasonable cause to believe that **KAWANTE DAQUON MAXWELL** had previously been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 932(b)(1).

COUNT THIRTEEN

(Trafficking in Firearms)

On or about August 27, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MATTHEW BLAKE ROBINSON** did ship, transport, transfer, cause to be transported, and otherwise dispose of a firearm, to wit: a Glock, Model 43x, 9mm pistol, bearing serial number AKPS320, to **KAWANTE DAQUON MAXWELL** in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of the firearm by **KAWANTE DAQUON MAXWELL** would constitute a felony, and did attempt and conspire to do so, in violation of Title 18, United States Code, Section 933(a)(1).

COUNT FOURTEEN

(Trafficking in Firearms)

On or about August 27, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **KAWANTE DAQUON MAXWELL** did receive from another person, in and otherwise affecting interstate and foreign commerce, a firearm, to wit: a Glock, Model 43x, 9mm pistol, bearing serial number AKPS320, knowing and having reasonable cause to believe that such receipt would constitute a felony, and did attempt and conspire to do so, in violation of Title 18, United States Code, Section 933(a)(2).

COUNT FIFTEEN

(Unlawful Possession of Firearm)

On or about August 27, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **KAWANTE DAQUON MAXWELL** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the felony offense of Burglary- Fourth Degree, in violation of CR.6.205(a), in the Circuit Court for Baltimore City, State of Maryland, in case number 320336002, did knowingly possess a Glock, Model 43x, 9mm pistol, bearing serial number AKPS320, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT SIXTEEN

(False Statement During Purchase of a Firearm)

On or about September 4, 2024, in Berkeley County, in the Northern District of West Virginia, defendant **MATTHEW BLAKE ROBINSON**, in connection with the acquisition of a firearm, that is a Glock 26, 9mm pistol, from a FFL, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to the FFL, which statement and identification was intended and likely to deceive the FFL, as to a material fact to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented himself to be the actual purchaser when he was not; in violation of Title 18, United States Code, Section 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATION

Gun Control Act

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1) and 934, the government will seek the forfeiture of any firearm and any ammunition involved in and used in any knowing violation of Title 18, United States Code, Sections 922(a)(6), 922(g)(1), 924(a)(2), 932, and 933 including the following a Glock, model 43X, 9mm caliber, bearing serial number AKPS320; a Glock, model 27, .40 caliber, bearing serial number UYG248; a Smith & Wesson, Model M&P 57, 5.7 caliber pistol bearing serial number EFC4008; associated firearm parts and accessories; ammunition; and \$6,603 U.S. currency.

A True Bill,

/s/

Grand Jury Foreperson

/s/

RANDOLPH J. BERNARD
Acting United States Attorney

Lara K. Ompps-Botteicher
Morgan C. McKee
Assistant United States Attorneys